

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Shawn SUELL

Case: 2:25-mj-30043

Assigned To : Unassigned

Assign. Date : 2/6/2025

Case No.

Description: RE: SHAWN SUELL
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 5, 2025 in the county of Wayne in the
Eastern District of Michigan SD, the defendant(s) violated:*Code Section**Offense Description*21 U.S.C. § 841(a)(1) and 846
18 United States Code Sections 922
and 924(c), 18 United States Code
Sections 922(j) and 924(c)Attempted Possession with Intent to Distribute a
Controlled Substance and Conspiracy to Distribute
a Controlled Substance and illegal possession, sale, or
other handling of stolen firearms and
ammunition and use or carrying of a firearm during and
in relation to a crime of violence or drug
trafficking crime.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: February 6, 2025City and state: Detroit, Michigan*Complainant's signature*

Lonnie Reynolds, Special Agent, HSI

Printed name and title*Judge's signature*

Hon David R. Grand., United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Lonnie Reynolds, being sworn, depose and state the following:

INTRODUCTION

1. This affidavit is in support of a criminal complaint charging Shawn SUELL with violations of 21 U.S.C. § 841(a)(1) and 846 (Attempted Possession with Intent to Distribute a Controlled Substance and Conspiracy to Distribute a Controlled Substance) and 18 United States Code Sections 922 and 924(c) (illegal possession, sale, or other handling of stolen firearms and ammunition and use or carrying of a firearm during and in relation to a crime of violence or drug trafficking crime.)

2. I am currently a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) in Detroit, Michigan. I have been employed as a Special Agent since September of 2023. My formal education includes a Bachelor of Science Degree in Criminal Justice from Eastern Michigan University. Prior to becoming a Special Agent with HSI, I was employed as a Criminal Analyst with HSI in Detroit, Michigan for 4 years. I have received specialized training about illegal drug trafficking and money laundering at the Federal Law Enforcement Training Center located in Brunswick, Georgia. I have led and participated in numerous investigations related to illegal drug trafficking as well as methods used to finance drug transactions and launder drug proceeds.

3. I make this affidavit based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement pertaining to this investigation.

4. As set forth in more detail below, this investigation has shown that on February 05, 2025, a search warrant was conducted at 4586 French Rd, Detroit, MI, located in the Eastern District of Michigan. The owner of the above address, Shawn SUELL (DOB: 09/20/1995) was present during the search warrant. An estimated weight of 3.6 kilograms of narcotics was seized along with various firearms. There is probable cause to conclude SUELL possessed with intent to distribute methamphetamine and fentanyl in violation of Title 21, United States Code, Sections 841(a)(1) and 846 Tile. As well as possession of stolen firearms and possession of firearms in conjunction with narcotics trafficking and 18 United States Code Sections 922 and 924(c).

PROBABLE CAUSE AND INVESTIGATION

5. As a part of its federal investigation, surveillance was conducted at 4586 French Rd. Multiple instances were observed in which vehicles stayed at the 4586 French Rd. residence for as little as 2 minutes, while other vehicles remained for

several hours. The frequent short stays are consistent with patterns typically associated with a stash house, based on my training and experience.

6. In October and November Homeland Security Investigations (HSI) conducted trash pulls at 4586 French Rd, Detroit, MI. Residue from vacuum sealed bag(s) from the trash pulls tested positive for fentanyl and methamphetamine.

7. On January 30, 2025, HSI Special Agent(s) obtained a federal search warrant based on the above information.

8. On February 05, 2025, HSI, Drug Enforcement Administration (DEA), Custom and Border Protection (CBP), along with state/local partners conducted a search warrant at 4586 French Rd, Detroit, MI.

9. During the search warrant the following was seized: One (1) Rifle (stolen law enforcement rifle), three (3) handguns (one registered to SUELL, one previously registered to SUELL, one stolen), one (1) draco pistol (registered to SUELL); 1.8 kilograms (4.05 pounds) of suspected methamphetamine, 1.7 kilograms (3.89 pounds) of suspected fentanyl; twenty four (24) firearm magazines, including 30, 50, 100 round magazines ; five hundred seventy (570) rounds of various ammunition; six (6) scales; twelve hundred (1,200) dollars USD; pill press parts; multiple empty bottles of promethazine with codeine; color dyes; blender(s) with suspected drug residue; one (1) money counter; various packaging material and documents.

11. SUELL was interviewed and stated he owned and resided at 4586 French Rd, Detroit, MI, which was confirmed according to law enforcement databases.

CONCLUSION

10. Based on information provided above, there is probable cause to believe that SUELL violated 21 U.S.C. § 841(a)(1) and 846 (Attempted Possession with Intent to Distribute a Controlled Substance and Conspiracy to Distribute a Controlled Substance). and 18 United States Code Sections 922(j) and 924(c) (illegal possession, sale, or other handling of stolen firearms and ammunition and use or carrying of a firearm during and in relation to a crime of violence or drug trafficking crime.)

Respectfully submitted,

Lonnie Reynolds

Lonnie Reynolds, Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence
And/or by reliable electronic means



HON. David R. GRAND
UNITED STATES MAGISTRATE

February 6, 2025